

EXHIBIT C

Subject: Re: Flint: Challenges to VNA's Confidential Designations
Date: Friday, August 11, 2023 at 6:05:49 PM Eastern Daylight Time
From: Corey Stern
To: Devine, Alaina N.
CC: Melanie Daly, Campbell, James M., molsen@mayerbrown.com,
McElvaine, Bryan D., Kramer, Kelly, gjordt@mayerbrown.com,
Silverman, Kristin, Dupre, Kristin M., Moshe S. Maimon, Jerome Block,
Hunter Shkolnik, Patrick Lanciotti

Alaina -

Thanks for your email.

For the correspondence we sent on July 28, 2023, we can file our Notice on the docket tomorrow. So please let us know if you are available for a meet and confer today or tomorrow.

Not only did we send the communication thirteen days ago, but we also requested the issue generally be placed on the agenda for Wednesday because we feel strongly that the process outlined in the subject order is inefficient.

We are happy to meet and confer in good faith, but we are not willing to delay our filing simply because you waited until 24 hours before we could file the Notice to reach out. We can limit this particular meet and confer to that communication.

We can confer on the second letter before August 17, when our Notice as to the letter can be filed.

For our third letter, we can confer before August 22, when our Notice as to that letter is due.

I can be free anytime this evening or anytime tomorrow.

We plan to file the Notice tomorrow, but we are willing to wait until 5:00 pm to do so.

The first letter covered those documents the Court recently reviewed in camera, so you should be familiar with them.

Let me know what works for you.

Best,

Corey M. Stern
Levy Konigsberg, LLP
605 Third Avenue, 33rd Floor
New York, New York 10158

(212)605-6298
(212)605-6290 (facsimile)
cstern@levylaw.com
www.levylaw.com

On Aug 11, 2023, at 5:15 PM, Devine, Alaina N. <ADevine@campbell-trial-lawyers.com> wrote:

Corey,

We are in receipt of your three letters, dated August 8, August 3, and July 29, challenging VNA's confidential designations for a variety of documents over several productions. We are evaluating these requests and request a meet and confer on this issue. Please let us know if you have availability to discuss this next week, perhaps on Wednesday.

Thank you,

Alaina N. Devine
Campbell Conroy & O'Neil
Professional Corporation

<image001.jpg>

20 City Square, Suite 300
Boston, MA 02129
Office: (617) 241-3037
Cell: (508) 612-6204
Email: adevine@campbell-trial-lawyers.com

-
-
Note : This e-mail contains information from the law firm of Campbell Conroy & O'Neil Professional Corporation that may be proprietary, confidential, or protected under the attorney- client privilege or work-product doctrine. This e-mail is intended for the use only of the named recipient. If you are not the intended recipient named above, you are strictly prohibited from reading, disclosing, copying, or distributing this e-mail or its contents, and from taking any action in reliance on the contents of this e-mail. If you received this e-mail in error, please delete this message and respond immediately by e-mail to the author or call (617) 241-3000.

From: Corey Stern <CStern@levylaw.com>
Sent: Tuesday, August 8, 2023 4:03 PM
To: molsen@mayerbrown.com; Campbell, James M. <jmccampbell@Campbell-trial-lawyers.com>

Cc: Melanie Daly <mdaly@levylaw.com>; Ted Leopold <tedjleopold@gmail.com>; Jordan Connors <jconnors@susmangodfrey.com>; Steve Morrissey <smorrissey@susmangodfrey.com>; Paul Novak <pnovak@weitzlux.com>; Hunter Shkolnik <Hunter@nsprlaw.com>; Patrick Lanciotti <PLanciotti@napolilaw.com>; Hunter Shkolnik <Hunter@napolilaw.com>; Richard Kuhl <KuhlR@michigan.gov>; Margaret Bettenhausen <BettenhausenM@michigan.gov>; TMendel <TMendel@bsdd.com>; Bill Kim <wkim@cityofflint.com>; Sheldon Klein <klein@butzel.com>; Rick Berg <Bergf@butzel.com>; Wayne B. Mason <wayne.mason@faegredrinker.com>; David C. Kent <david.kent@faegredrinker.com>; Philip Erickson <PErickson@plunkettcooney.com>; Susan Smith <SSmith@bdlaw.com>; Brian MacDonald <bmacdonald@ccglawyers.com>; Todd Weglarz <tweglarz@fiegerlaw.com>; Donald Dawson <d.dawson@fiegerlaw.com>; Michael L. Williams <Michael.L.Williams@usdoj.gov>; Eric A. Rey <Eric.A.Rey@usdoj.gov>; Devine, Alaina N. <ADevine@Campbell-trial-lawyers.com>; Dupre, Kristin M. <KDupre@Campbell-trial-lawyers.com>; Campbell, Richard P. <rpcampbell@Campbell-trial-lawyers.com>; Ringstad, Andreas <aringstad@campbell-trial-lawyers.com>; O'Donnell, Jack J. <JODonnell@CampbellTrialLawyers.com>; Penhallegon, John R. <jpenhallegon@campbelltriallawyers.com>; Chris Muha <Cmuha@kaiserdillon.com>; Howe, Christopher R. <chowe@Campbell-trial-lawyers.com>; Fletcher, Christopher D. <CFletcher@campbell-trial-lawyers.com>; Cahill, William C. <WCahill@campbell-trial-lawyers.com>; Kelly Kramer <kkramer@mayerbrown.com>; Kristin Silverman <KSilverman@mayerbrown.com>; Ter Molen, Mark <MTerMolen@mayerbrown.com>; William Sinnott <WSinnott@mayerbrown.com>; Minh Olivier Nguyen-Dang <MNguyen-Dang@mayerbrown.com>; Chris Weld <cweld@toddweld.com>; Thompson, Craig S. <cthompson@sullivanwardlaw.com>; travis.gamble@faegredrinker.com; vance.wittie@faegredrinker.com; Moshe S. Maimon <MMaimon@levylaw.com>; Jerome Block <JBlock@levylaw.com>

Subject: FWC - Challenge (3) to "Confidential" Designations

Counsel for Veolia:

Please see correspondence attached related to the above-referenced matter.

Best,

Corey M. Stern
Levy Konigsberg, LLP
605 Third Avenue, 33rd Floor
New York, New York 10158
(212)605-6298
(212)605-6290 (facsimile)
www.levylaw.com

CONFIDENTIALITY STATEMENT This e-mail transmission and any

accompanying attachment contains information that is confidential, privileged and exempt from disclosure under applicable law. This e-mail is intended only for the use of the individual or entity to which it is addressed. If you receive this e-mail in error or you are not the intended recipient, do not read, copy or disseminate in any manner. If you are not the intended recipient, you may not disseminate, distribute or copy this communication and any disclosure, copying, distribution, use or taking any action in reliance on the contents of this information is strictly prohibited. If you received this communication in error, please reply to the message immediately by informing the sender that the message was misdirected and after advising the sender you must erase the message from your computer system and destroy any hard copies that may have been made. Thank you for your assistance in correcting this error.

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.